

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JOHN DOE,

Plaintiff,

v.

BUTLER UNIVERSITY,

Defendant.

Case No. 1:22-cv-01828-SEB-MG

PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF CASE DEADLINES

Plaintiff John Doe (“Plaintiff” or “Doe”), pursuant to Fed. R. Civ. P. 6(b)(1)(A) and S.D. Ind. L.R. 6-1(c), respectfully requests an extension of the current deadlines for the completion of discovery and case as a whole. Defendant Butler University (“Defendant” or “Butler”) has indicated that they do not oppose the relief requested. Plaintiff states that good cause for such an extension exists:

1. The Court adopted the following case deadline dates on November 22, 2022, set forth by the Parties [ECF No. 26]:

ECF No. 26 Date	Discovery Deadline
July 13, 2023	Deadline to complete non-expert discovery
July 20, 2023	Deadline for party with burden of proof to submit statement
September 13, 2023	Deadline to submit all dispositive motions

2. The Parties engaged in a status conference on May 2, 2023 regarding a separate discovery issue. [ECF No. 49].

3. The Parties have been engaged in the discovery process, accordingly.

4. Due to several impending deadlines in other matters (including depositions and hearings), the recently passed federal holiday, illness of counsel, and deponent availability, the Parties respectfully an extension of the discovery and case deadlines as follows:

ECF No. 26 Date	Proposed New Date	Deadline
July 13, 2023	August 13, 2023	Deadline to complete non-expert discovery
July 20, 2023	August 18, 2023	Deadline for party with burden of proof to submit statement
September 13, 2023	September 27, 2023	Deadline to submit all dispositive motions

5. The Parties have agreed to conduct depositions on the following dates: July 10, August 4, August 10, and August 11, 2023, accordingly.

6. Based on the foregoing, neither party will be prejudiced be the relief requested herein.

7. The Parties have conferred on this matter. As indicated above, the Defendant does not oppose the relief requested.

WHEREFORE, Plaintiff respectfully requests to extend the case deadlines as noted above.

Respectfully submitted,

SAEED & LITTLE, LLP

/s/ Jonathan Little
Jonathan Little, Atty. No. 27421-49
#189 - 133 W Market Street
Indianapolis, IN 46204
(812) 320-3367
jon@sllawfirm.com

NESENOFF & MILTENBERG, LLP

/s/ Andrew T. Miltenberg, Esq.
Andrew T. Miltenberg, Esq.

**Stuart Bernstein, Esq.
Kristen Mohr, Esq.
363 Seventh Avenue, Fifth Floor
New York, New York 10001
(212) 736-4500
amiltenberg@nmllplaw.com
sbernstein@nmllplaw.com
kmohr@nmllplaw.com**

Attorneys for Plaintiff John Doe

CERTIFICATE OF SERVICE

I certify that the foregoing was filed using the Court's CM/ECF system on the date electronically stamped in the header. Service was made contemporaneously on all ECF-registered counsel of record by operation of the same.

s/ Jonathan Little

Jonathan Little